

Exhibit 2

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

IRIS CONNEX, LLC,

Plaintiff,

v.

ACER AMERICA CORP,

Defendant.

Case No. 2:15-cv-01909-JRG

Lead Case

IRIS CONNEX, LLC,

Plaintiff,

v.

DELL INC.,

Defendant.

Case No. 2:15-cv-01915-JRG

Consolidated Case

DECLARATION OF MICHAEL J. COLLINS

I, Michael J. Collins, declare as follows:

1. I am a licensed private investigator with the State of Texas, and am a member of the Texas Association of Licensed Investigators. I am the owner and manager of Collins Investigations, located at 110 North College, Suite 1504 in Tyler, Texas.

2. Unless otherwise noted or supported by the attached Exhibits, I submit this declaration based on my personal knowledge of the facts described herein or based upon records reviewed or information obtained during my investigation of the facts stated, which facts I believe to be true.

3. I was asked by Deron Dacus, of The Dacus Firm PC, who I understand to be counsel for Dell Inc. in the above captioned matter, to investigate the listed office of Iris Connex, LLC at 211 East Tyler Street, Suite 600-A, Longview, Texas. (*See* Compl. ¶ 3 [Dkt. No. 1].)

4. On March 15, 2016, at approximately 9:50 a.m. CST, I travelled to 211 East Tyler Street, Suite 600, Longview, Texas. The location is a nine-story office building located in downtown Longview at the intersection of East Tyler Street and North Fredonia.

5. I entered the building and found a directory for the building, located in the lobby. There is no listing on the building directory for a suite “600-A.” There is also no listing on the building directory “Iris Connex, LLC” in any office in the building.

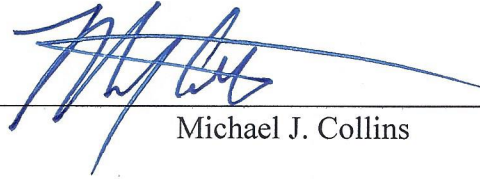
6. I went to the sixth floor of the building and observed a sign titled “Executive Suites,” which did not list Iris Connex LLC. The reception desk on the sixth floor was unoccupied. I observed a hallway on the sixth floor with several doors on each side. None of the doors were marked with numbers or signs identifying which office was located in which door. There was no way to identify which door was Suite 600, or Suite 600-A. no numbers or signs on any door indicating any office location. I found no additional designations related to “Suite 600-A” or “Iris Connex.”

7. Thereafter, I left the premises. I found no evidence of a company named “Iris Connex, LLC” during my review of the property records or my visit to 211 East Tyler Street, Longview, Texas.

8. Attached to this Declaration as Exhibit A are photographs of the building exterior, directories, and sixth floor.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: May 25, 2016



Michael J. Collins

EXHIBIT A

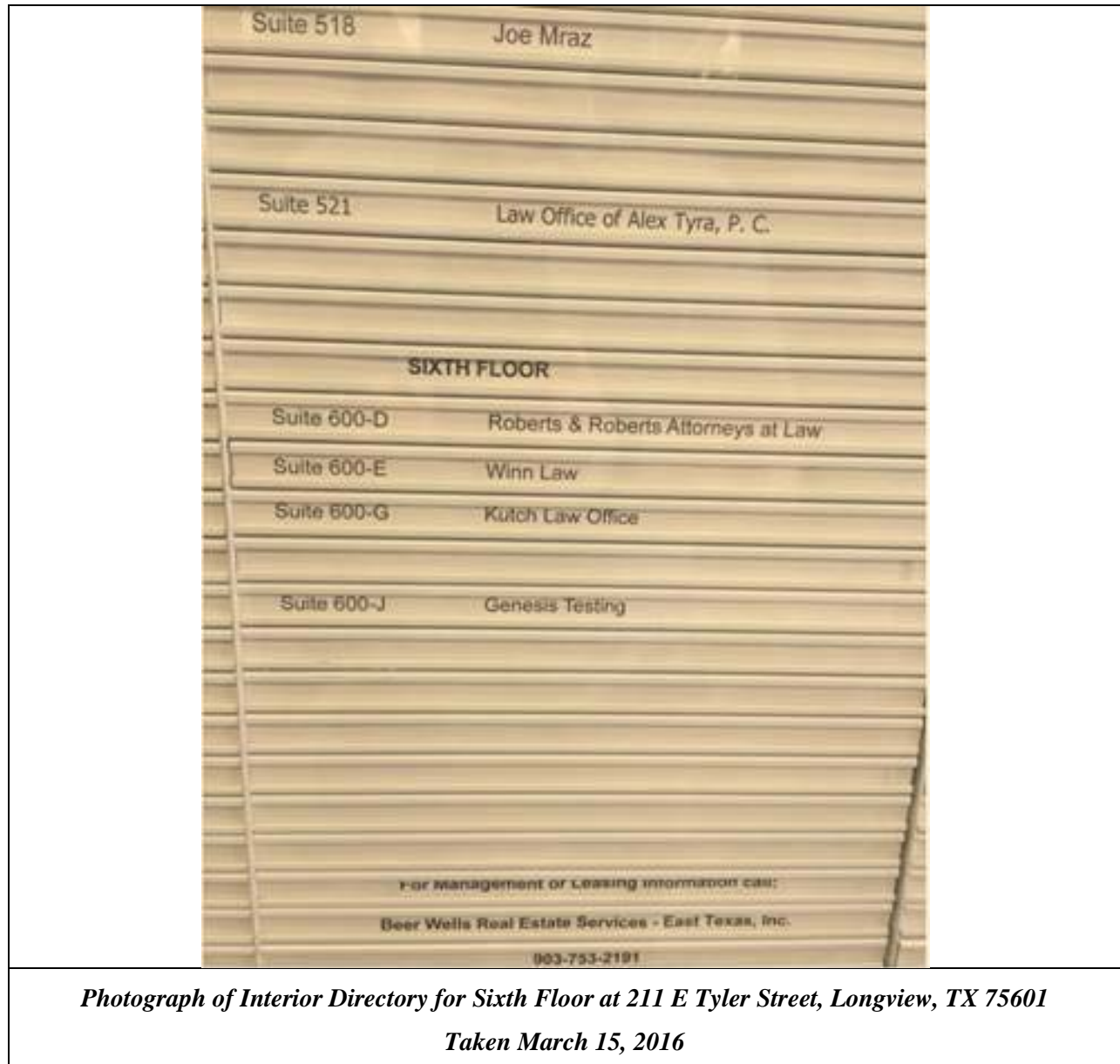


*Photograph of Exterior of 211 E Tyler Street, Longview, TX 75601
Taken March 15, 2016*



Photograph of Interior Directory at 211 E Tyler Street, Longview, TX 75601

Taken March 15, 2016





Photograph of Sixth Floor Directory at 211 E Tyler Street, Longview, TX 75601

Taken March 15, 2016



Photograph of Sixth Floor Hallway at 211 E Tyler Street, Longview, TX 75601

Taken March 15, 2016